

February 26, 2015

Via Electronic Filing

Ms. Marlene Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 Twelfth Street S.W.
Washington, DC 20554

Re: Special Access Data Collection, WC Docket No. 05-25; RM-10593
Wavecom Solutions Corporation
FRN 05940671

Dear Ms. Dortch:

With this letter, Wavecom Solutions Corporation (“Wavecom”) files a public version of the following essay responses in the above-referenced Special Access Data Collection proceeding, in accordance with the *Order and Data Collection Protective Order*, DA-14-1424, adopted October 1, 2014: II.A.5, II.A.8, II.A.10, II.A.11 Part 2, II.A.18, II.A.19, II.D.1, II.D.2, II.F.8, II.F.9, II.F.10, II.F.11, and II.F.12.

Wavecoms’s responses have also been submitted via the Special Access Web Portal.

Please direct any questions regarding this matter to me at 808-546-3877 or at steven.golden@hawaiiantel.com.

Sincerely,



Steven P. Golden
Vice President, External Affairs

Attachment

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Wavecom Solutions Corporation

Question II.A.5

Provide a map showing the fiber routes that you (a) own or (b) lease pursuant to an *IRU* agreement that constitute your network, including the fiber *Connections* to *Locations*. In addition, include the locations of all *Nodes* used to interconnect with third party networks, and the year that each *Node* went live.

Response:

Wavecom provided its map and accompanying required documentation, which is considered "Highly Confidential Data", via the "Highly Confidential" upload section of the Special Access Web Portal.

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Wavecom Solutions Corporation

Question II.A.8:

Explain your business rule(s) used to determine whether to build a *Connection* to a particular *Location*. Provide underlying assumptions.

- a. Describe the business rules and other factors that determine where you build your *Connections*. Describe the business rules and other factors that determine where you build your *Connections*. Examples of such rules/factors are minimum *Term Commitments* or minimum capacity commitments by the buyer; maximum build distances from the building to your core network; and/or number of competitors in the area. Include, also, any factors that would prevent you from building a *Connection* to an otherwise suitable *Location*. These could be factors that are under your control or those that are not.
- b. Explain how, if at all, business density is incorporated into your business rule, and if so, how you measure business density.
- c. In areas where your business rule has been most successful, explain why. Provide examples of geographic regions (if any) where you generally were or are able to successfully deploy *Connections*, and where you generally have experienced or currently experience serious difficulties in deploying *Connections*, and, if you are able to provide examples of both kind of regions, indicate what distinguishes these different regions.

Response:

Wavecom was acquired by Hawaiian Telcom, Inc. ("HTI") on December 31, 2012¹, and
[BEGIN HIGHLY CONFIDENTIAL INFORMATION]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED] [END HIGHLY CONFIDENTIAL INFORMATION]

¹ See Federal Communications Commission WC Docket No. 12-206, *In the Matter of Wavecom Solutions Corporation, Transferor and Hawaiian Telcom, Inc., Transferee; Application for Consent to Transfer Control*, and Hawaii Public Utilities Commission Docket No. 2012-0174, *In the Matter of the Application of Hawaiian Telcom, Inc. and Wavecom Solutions Corporation For an Exemption or Waiver from all Regulatory Requirements, or in the Alternative, Approval of the Share Purchase Transaction and Related Transactions*

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Wavecom Solutions Corporation

Question II.A.10:

Provide data, maps, information, marketing materials, and/or documents identifying those geographic areas where you, or an *Affiliated Company*, advertised or marketed *Dedicated Service* over existing facilities, via leased facilities, or by building out new facilities as of December 31, 2013, or planned to advertise or market such services within twenty-four months of those dates.

Response:

Wavecom was acquired by Hawaiian Telcom, Inc. ("HTI") on December 31, 2012¹, and [BEGIN HIGHLY CONFIDENTIAL INFORMATION]

[END HIGHLY CONFIDENTIAL INFORMATION]

Wavecom's affiliates include Hawaiian Telcom, Inc., Hawaiian Telcom Services Company, Inc. and SystemMetrics Corporation.

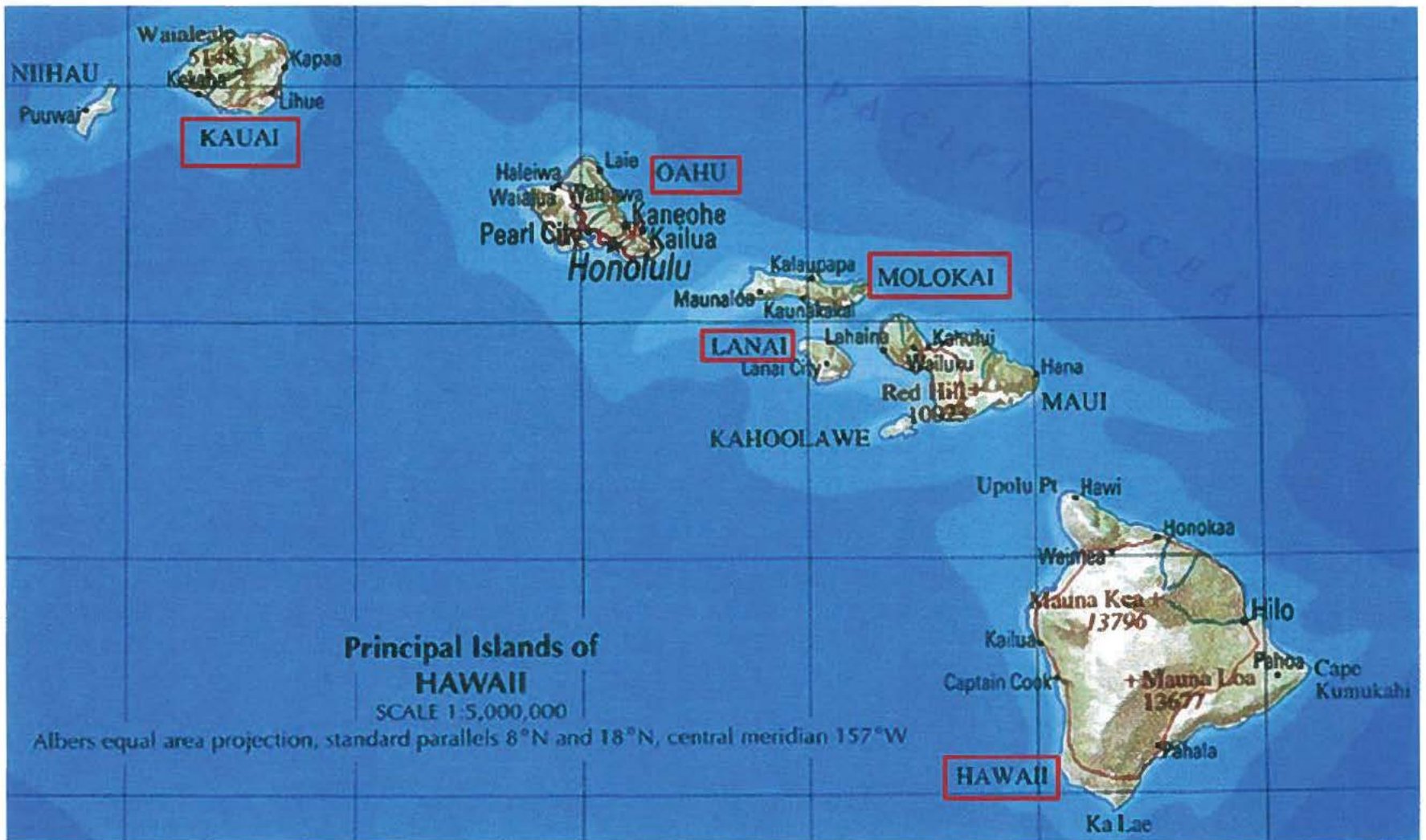
Hawaiian Telcom, Inc. markets *Dedicated Services* on the islands of Kauai, Oahu, Maui, Molokai, Lanai and Hawaii in the state of Hawaii. See Attachment 1 for a map of the state of Hawaii. Marketing materials are found on the Company's website at www.hawaiiantel.com. See Attachment 2 for examples from the website.

Hawaiian Telcom Services Company, Inc. markets *Dedicated Services* on the islands of Kauai, Oahu, Maui, Molokai, Lanai and Hawaii in the state of Hawaii. See Attachment 1 for a map of the State of Hawaii. Marketing materials are found on the Company's website at www.hawaiiantel.com. See Attachment 2 for examples from the website.

SystemMetrics Corporation provides *Dedicated Services* within the downtown business district of Honolulu, on the island of Oahu. See Attachment 3 for a map of Honolulu. Marketing materials are found on the Company's website at www.systemmetrics.com, and samples from the website are also provided in Attachment 3.

¹ See Federal Communications Commission WC Docket No. 12-206, *In the Matter of Wavecom Solutions Corporation, Transferor and Hawaiian Telcom, Inc., Transferee; Application for Consent to Transfer Control*, and Hawaii Public Utilities Commission Docket No. 2012-0174, *In the Matter of the Application of Hawaiian Telcom, Inc. and Wavecom Solutions Corporation For an Exemption or Waiver from all Regulatory Requirements, or in the Alternative, Approval of the Share Purchase Transaction and Related Transactions*

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**Hawaiian Telcom, Inc. and Hawaiian Telcom Services Company, Inc.
Dedicated Services Offerings for Large Business**

RESIDENTIAL BUSINESS WHOLESALE ABOUT US

Search

Call or click here for a free consultation
643-0944

Hawaiian Telcom

Products Solutions Support

Home > Business > Large Business

LARGE BUSINESS

Innovation to take your business to the next level.
We help companies with advanced solutions that extend beyond voice to data, managed services and the cloud.
[View Cloud Services](#)

Get In Touch
Talk to your company's Hawaiian Telcom account representative or initiate a new consultation about how we can help.
[Contact Us](#)

Products
Our unmatched portfolio of leading edge communications services will help you take your business to the next level.
▶ [Business Voice](#)
▶ [Broadband & Private Networks](#)
▶ [Cloud Services](#)
▶ [Managed Services](#)
▶ [Partner Solutions](#)
▶ [Security](#)
▶ [Wireless](#)

Solutions
We provide solutions to many of Hawaii's largest companies, across a wide range of industries.
▶ [Solutions by Industry](#)
▶ [Communication and Connectivity](#)
▶ [Security](#)

Featured Product
Hosted Voice
Designed to keep you connected to your customers and your employees no matter where your business takes you.
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**Hawaiian Telcom, Inc. and Hawaiian Telcom Services Company, Inc.
Dedicated Services Offerings for Large Business**

The screenshot displays the Hawaiian Telcom website interface. At the top, a navigation bar includes links for RESIDENTIAL, BUSINESS, WHOLESALE, and ABOUT US, alongside a search bar. The main header features the Hawaiian Telcom logo and a contact number, 643-0944, with a prompt to call or click for a free consultation. Below this, a secondary navigation bar lists Products, Solutions, and Support. The main content area is titled 'LARGE BUSINESS' and features a large banner with the text 'We're all about the fastest connection.' and a sub-header 'BUSINESS BROADBAND & PRIVATE NETWORKS'. The banner also includes a small image of a tunnel with a light beam. Below the banner, there are two columns of service offerings: 'Business Broadband' (Ethernet Dedicated Internet Access, Business High-Speed Internet) and 'Private Network Solutions' (Switched Ethernet, IP VPN). The footer contains links for Small & Medium Business, Large Business, and Government, along with a contact number, 643-0944, and social media icons for Facebook and Twitter.

RESIDENTIAL BUSINESS WHOLESALE ABOUT US

Search

Hawaiian Telcom

Call or click here for a free consultation
643-0944

Products Solutions Support

Home > Business > Large Business > Products > Broadband & Private Networks

LARGE BUSINESS

We're all about the fastest connection.

Our networks can provide you with the speed and bandwidth to meet any need.

BUSINESS BROADBAND & PRIVATE NETWORKS

In the age of global connectedness, you can't afford to be left in the slow lane. Whether it's consulting with colleagues, video-conferencing with suppliers or analyzing business intelligence, you rely on your network to keep you connected. That's why we offer Hawaii businesses a portfolio of Internet services that provide all the bandwidth and speed you need.

With Hawaiian Telcom as your trusted Internet services partner, you can count on reliable, high-speed Internet connections and robust, dependable networking solutions to keep you online and connected — all at a price that doesn't dent your bottom line.

Business Broadband

- ▶ Ethernet Dedicated Internet Access
- ▶ Business High-Speed Internet

Private Network Solutions

- ▶ Switched Ethernet
- ▶ IP VPN

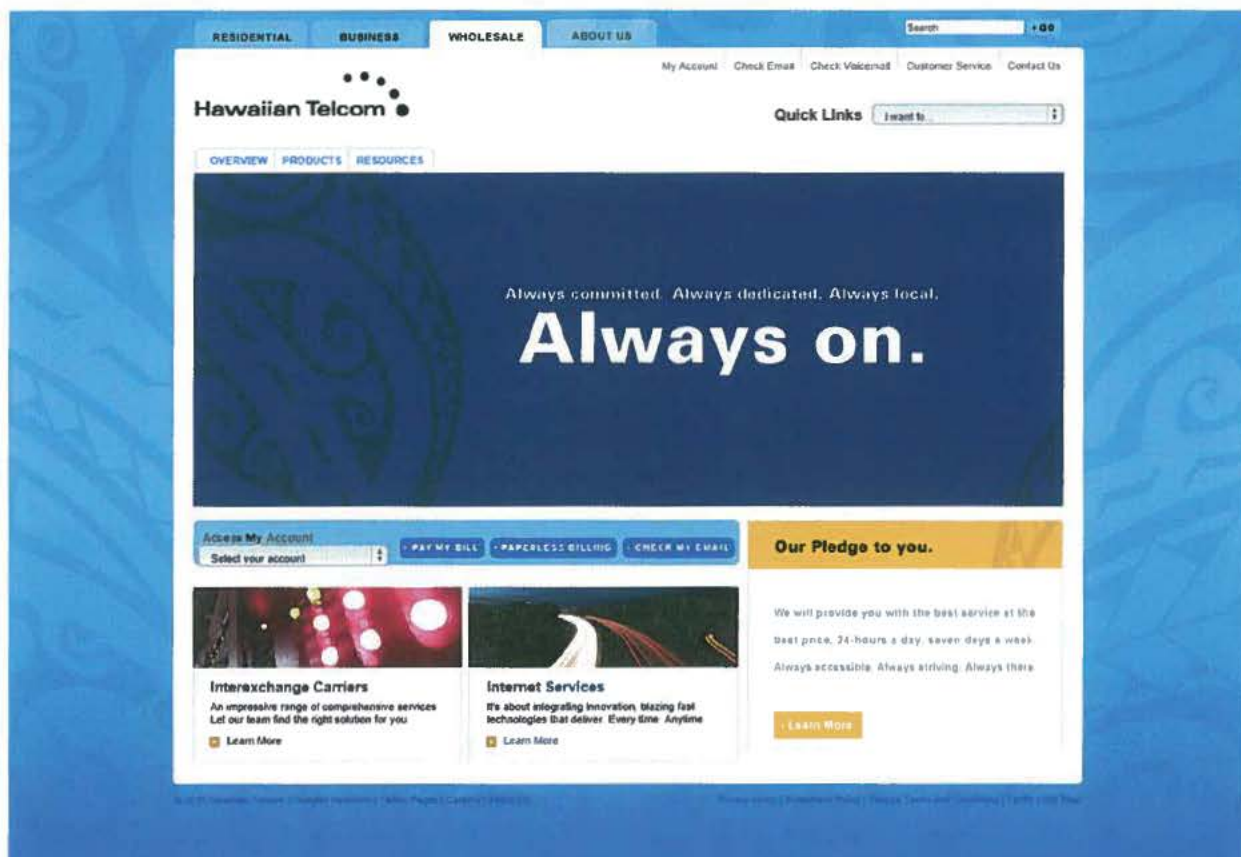
Small & Medium Business | Large Business | Government

Support | View & Pay Bill | Contact Us | Order Services

Call for a free consultation:
643-0944

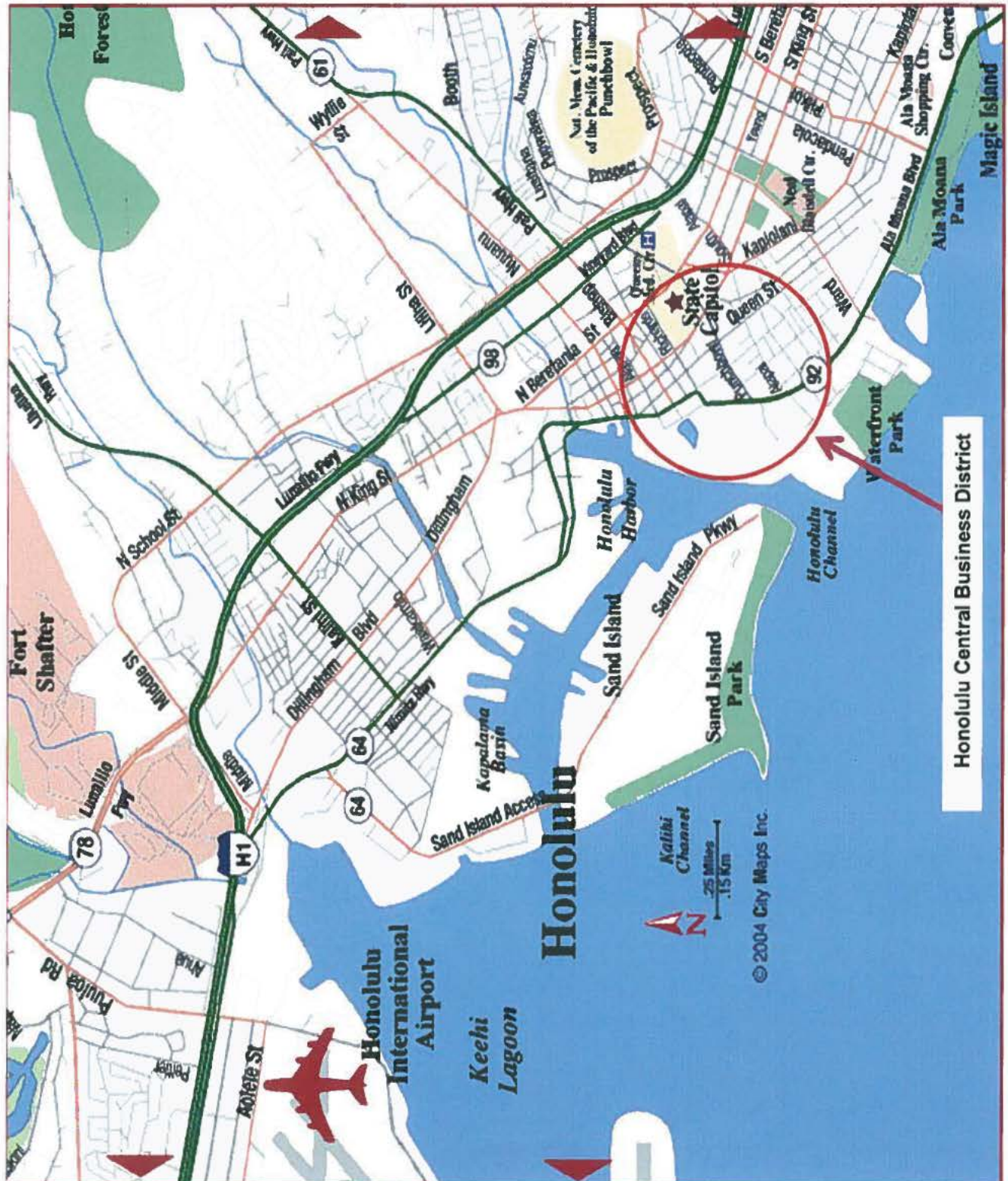
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Hawaiian Telcom, Inc.
Dedicated Services Offerings for Wholesale Customers




Map of Honolulu
SystemMetrics Corporation
Geographic Area

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SystemMetrics Corporation Dedicated Services



systemmetrics
A Hawaiian Telecom Company

Call or click here for a free consultation.
(808) 791-7000

ServicesAbout UsSupport CenterCustomer PaymentsContact Us

Virtual EnvironmentsColocationNetwork ServicesVoIP ServicesBackup Services

Home > Services > Network Services

Network Services

Engineered Private Connectivity Solutions (EPCS)

SystemMetrics's engineering expertise enables businesses to overcome the challenges presented by more conventional network bandwidth offerings.

Engineered Private Connectivity Solutions (EPCS)

SystemMetrics Engineered Private Connectivity Solutions (EPCS) provide businesses with the ability to connect multiple sites privately and securely. This creates a Wide Area Network (WAN) which extends the corporate internal network to all locations. Customer sites may utilize different transport mediums at different sites based on their specific requirements, while SystemMetrics provides the overall orchestration of the private customer network mediums. EPCS can provide Quality of Service (QoS), routed and switched connectivity to multi-site or site-to-offsite competing environments.

Benefits

- Flexibility - EPCS supports different data circuit mediums at each customer site. Quality of Service can give priority to certain types of traffic such as VoIP and video conferencing.
- Scalability - Additional sites are easily added to the corporate network.
- Efficiency - EPCS enhances efficiency by optimizing the data path between locations, while boosting performance and reducing equipment requirements at each site.

Commercial Internet Access

SystemMetrics provides redundant-carrier Internet access over a variety of connection mediums up to 10Gbps. Internet delivery may include DSL, DS1 (or T1), Ethernet over Fiber, DS3, OC-3, and Commercial Port-to-Port Wireless solutions. Internet is delivered via a blend of multiple carriers, ensuring that businesses achieve peak performance and availability. (Multiple carriers mean better Internet routing options and greater uptime.)

SystemMetrics can also provide custom BGP options for enterprise customers looking to diversify their Internet connectivity options. For Hawaii-based Internet customers, SystemMetrics Internet Access includes the Internet Exchange between different ISPs and Internet carriers in Hawaii. This Internet Exchange optimizes Internet routing within the State of Hawaii, resulting in optimal Internet performance. We can also provide managed, firewalled connectivity to customers — further reducing customer equipment and maintenance requirements.

Benefits

- Optimal Performance - Connection speeds of up to 10Gbps Internet access, with optimal routing provided via multiple carrier routes and included Internet Exchange.
- Reliability - Multiple carrier connections maintain customer Internet access during carrier maintenance windows; customers remain online, all the time.
- Flexibility - There is a number of available options for Internet Access Delivery, ranging from DSL to Gigabit Ethernet over fiber, with wireless delivery solutions also available; all connections are typically provided to customer in a familiar Ethernet handoff.

24x7 Support with 99.99% Uptime Guarantee

At SystemMetrics, we take our network engineering very seriously, along with our mission to provide Hawaii's businesses with the highest quality data transport available. Our engineers and network are available for your business on a 24/7 basis, and we back our services with a 99.99% uptime guarantee (which we consistently exceed). Our redundant connectivity, superior engineering, and around-the-clock monitoring make us uniquely qualified to handle the most critical of your business connectivity needs.

Get more info

Business solutions are customized to your business needs. Talk to a sales consultant to get more information.

Request a call back

Submit Request

Privacy Statement

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Question II.A.11 Part 2:

Lastly, identify the business rules you rely upon to determine whether to submit a bid in response to an RFP.

Response:

Wavecom elects not to respond to this optional question.

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Question II.A.18:

If you offer *Dedicated Services* pursuant to an agreement or *Tariff* that contains either a *Prior Purchase-Based Commitment* or a *Non-Rate Benefit*, then explain how, if at all, those sales are distinguishable from similarly structured *ILEC* sales of *DS1s*, *DS3s*, and/or *PBDS*.

Response:

Wavecom has not, and does not, offer *Dedicated Services* pursuant to an agreement or *Tariff* that contains either a *Prior Purchase-Based Commitment* or a *Non-Rate Benefit*.

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Wavecom Solutions Corporation

Question II.A.19:

Provide the business justification for the *Term* or *Volume Commitments* associated with any *Tariff* or agreement you offer or have in effect with a customer for the sale of *Dedicated Services*.

Response:

Wavecom [BEGIN HIGHLY CONFIDENTIAL INFORMATION]

[REDACTED]

[REDACTED] [END
HIGHLY CONFIDENTIAL INFORMATION]

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Wavecom Solutions Corporation

Question II.D.1:

Describe your company's short term and long-range promotional and advertising strategies and objectives for winning new – or retaining current – customers for *Dedicated Services*. In your description, please describe the size (e.g., companies with 500 employees or less, etc.), geographic scope (e.g., national, southeast, Chicago, etc.), and type of customers your company targets or plans to target through these strategies.

Response:

Wavecom was acquired by Hawaiian Telcom, Inc. ("HTI") on December 31, 2012¹, and **BEGIN HIGHLY CONFIDENTIAL INFORMATION** [REDACTED]

[REDACTED] **[END HIGHLY CONFIDENTIAL INFORMATION]**

Because HTI is in the process of integrating Wavecom's network and customers into its own operations, **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** [REDACTED]

[REDACTED] **[END HIGHLY CONFIDENTIAL INFORMATION]**

¹ See Federal Communications Commission WC Docket No. 12-206, *In the Matter of Wavecom Solutions Corporation, Transferor and Hawaiian Telcom, Inc., Transferee; Application for Consent to Transfer Control*, and Hawaii Public Utilities Commission Docket No. 2012-0174, *In the Matter of the Application of Hawaiian Telcom, Inc. and Wavecom Solutions Corporation For an Exemption or Waiver from all Regulatory Requirements, or in the Alternative, Approval of the Share Purchase Transaction and Related Transactions*

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Wavecom Solutions Corporation

Question II.D.2:

Identify where your company's policies are recorded on the following *Dedicated Service*-related processes: (a) initiation of service; (b) service *Upgrades*; and (c) service *Disconnections*. For instance, identify where your company records recurring and non-recurring charges associated with the processes listed above. If recorded in a *Tariff*, provide the specific *Tariff* section(s). If these policies are recorded in documents other than *Tariffs*, list those documents and state whether they are publicly available. If they are publicly available, explain how to find them. For documents that are not publicly available, state whether they are conveyed to customers orally or in writing.

Response:

Wavecom's policies for initiation of service, service upgrades and disconnections for services regulated by the Hawaii Public Utilities Commission (HPUC) can be found in its HPUC Tariff No. 3:

- Section III. Regulations
 - III.B.3 – OC-12 Service, OC-3 Service, DS3 Service, DS1 Service
- Section IV. Rates
 - IV.B.1-3 – Recurring charges, Nonrecurring charges, and Termination Agreement
 - IV.C.1-4 – Service Rates for OC-12, OC-3, DS3, DS1 Service

For services regulated by the Federal Communications Commission, rates, terms and conditions can be found in Wavecom's Interstate Price List No. 1:

- Section 2. Terms and Conditions
- Section 7. Special Access/Private Line Service
- Section 8. Rates and Charges – Access Service
- Section 9. Frame Relay Service
- Section 10. ATM Cell Relay Service

Terms and Conditions for non-tariff services provided by Wavecom are publicly available and can be found on the Company's website. Prices are not available publicly because these services are provided under an individually contracted Service Quote and Service Agreement with each end-user customer. These confidential documents are provided in either soft or hard copy to the end-user customer.

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Wavecom Solutions Corporation

Question II.F.8:

II.F.8. (Optional) Explain whether the terms and conditions of any *Tariff* or contract to which you are a party for the purchase of *Dedicated Services* or the policies of any of your *Providers* constrain your ability to:

- a. Decrease your purchases from your current *Provider(s)*;
- b. Purchase services from another *Provider* currently operating in the geographic areas in which you purchase services;
- c. Purchase non-tariffed services, such as Ethernet services, from your current *Provider* of tariffed *DS1*, *DS3*, and/or *PBDS* services or from other *Providers* operating in the geographic areas in which you purchase tariffed services;
- d. Contract with *Providers* that are considering entering the geographic areas in which you purchase tariffed services;
- e. Move circuits, for example, moving your *DS1* and/or *DS3 End-User Channel Terminations* to connect to another *Transport Provider*; or
- f. Otherwise obtain *Dedicated Services* or change *Providers*.

Response:

Not applicable.

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Wavecom Solutions Corporation

Question II.F.9:

II.F.9. (Optional) If you purchase, or purchased, *Transport Service* and *End User Channel Terminations* from the same *Provider*, explain your experience with changing *Transport Service* from one *Provider* to another between January 1 and December 31, 2013 while keeping your *End User Channel Terminations* with the original *Provider*. Where appropriate, identify the *Provider(s)* in your responses below and indicate whether they are an *ILEC* or a *Competitive Provider*.

- a. How many times did you change *Transport Service* while keeping your *End User Channel Terminations* with the original *Provider*? An estimate of the number of circuits moved to a new *Transport Provider*, or the number of such changes requested, is sufficient.
- b. What was the length of time, on average, it took for the original *Provider* to complete the process of connecting your last-mile *End-user Channel Terminations* to another *Transport Provider*? An estimate is sufficient.
- c. Were you given the opportunity to negotiate the amount of time it would take to complete the process of connecting your *End User Channel Terminations* to another *Transport Provider* on a case-by-case basis? In answering this question, also describe and provide citations to the *ILEC's* or *Competitive Provider's* policies, rules or, where relevant, *Tariff* provisions, if known, explaining the transition process.
- d. How did connecting to a new *Transport Provider* impact the rate you paid for the *End User Channel Terminations* you continued to purchase from the original *Provider*?
- e. Did connecting to a new *Transport Provider* typically impact the rate you continued to pay for *Transport Service* from the original *Provider* while the change in *Transport Providers* remained pending? If so, how? What was the average percentage change in rates? For example, did you ever pay a *One Month Term Only Rate* during that time?

Response:

Not applicable.

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Wavecom Solutions Corporation

Question II.F.10:

II.F.10. (Optional) Describe any circumstances since January 1, 2013, in which you have purchased circuits pursuant to a *Tariff*, solely for the purpose of meeting a *Prior Purchase-Based Commitment* required for a discount or *Non-Rate Benefit* from your *Provider* (i.e., you would not have purchased the circuit but for the requirement that you meet a *Volume Commitment* required for a discount or *Non-Rate Benefit* from your *Provider*). In your description, provide at least one example, which at a minimum, lists:

- a. The name of the *Provider* providing the circuits at issue;
- b. A description of the *Prior Purchase-Based Commitment*;
- c. The *Tariff* and section number(s) of the specific terms and conditions described;
- d. The number of circuits you would not have purchased but for the *Prior Purchase-Based Commitment* requirement to receive a discount or *Non-Rate Benefit*;
 - i. Of the circuits reported in II.F.10.d, how many did you not use at all?
- e. A comparison of the dollar amount of the unnecessary circuit(s) purchased versus the dollar amount of penalties your company would have had to pay under the *Prior Purchase-Based Commitment* had it not purchased and/or maintained the circuit(s), and a description of how that comparison was calculated.
- f. How many circuits were activated under the identified *Tariff* plan and not used when you initially entered into the plan? What were these unused circuits as a percent of the total circuits currently purchased under this *Tariff* plan? Indicate the percent of the total circuits currently purchased under this *Tariff* plan that exceed your *Prior Purchase-Based Commitment*.
- g. For the *Prior Purchase-Based Commitment*, indicate whether you are able to buy any *DS1s* or *DS3s* from the *Provider* outside of the identified *Tariff* plan, or are you required to make all purchases from the *Provider* pursuant to the identified *Tariff* plan?

Response:

Not applicable.

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Wavecom Solutions Corporation

Question II.F.11:

For each year for the past five years, state the number of times and in what geographic area(s) you have switched from purchasing *End-User Channel Terminations* from one *Provider of Dedicated Services* to another.

Response:

In the past five years, Wavecom Solutions Corporation [BEGIN HIGHLY
CONFIDENTIAL INFORMATION]

[END HIGHLY CONFIDENTIAL INFORMATION]

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Wavecom Solutions Corporation

Question II.F.12:

II.F.12. (Optional) Explain the circumstances since January 1, 2013 under which you have paid *One Month Term Only Rates* for *DS1*, *DS3*, and/or *PBDS* services and the impact, if any, it had on your business and your customers. In your response, indicate any general rules you follow, if any, concerning the maximum number of circuits and maximum amount of time you will pay *One Month Term Only Rates*, and your business rationale for any such rules.

Response:

Not applicable.